

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

NORTHSTAR ENERGY LLC,  
A Delaware limited liability company,

Plaintiff,  
v.

ENCANA CORPORATION,  
a Canadian corporation, and

ENCANA OIL & GAS USA INC.,

a Delaware corporation, and

CHESAPEAKE ENERGY CORPORATION,  
an Oklahoma corporation, and

O.I.L. NIAGARAN, LLC,  
a Michigan limited liability company,

Defendants.

Case No. 1:13-cv-00200-PLM

Chief Judge Paul L. Maloney

Mag. Judge Joseph G. Scoville

**JOINT STIPULATION TO RESET  
VOLUNTARY DISCLOSURE DATE**

---

Defendants Encana Corporation and Encana Oil & Gas USA, Inc., Defendants Chesapeake Energy Corporation and O.I.L. Niagaran, LLC, and Plaintiff NorthStar Energy LLC (the “Parties”), stipulate and agree to the following:

1. The current June 5, 2014 deadline for the voluntary exchange of documents set out in this Court’s May 9, 2014 Case Management Order will be extended to June 17, 2014 to accommodate the Parties’ continued efforts to reach a mutually agreeable protocol on the production of electronically stored information (“ESI”).
2. The Parties will exchange voluntary productions by June 17, 2014 provided that they are able to reach a mutually agreeable ESI protocol by June 11, 2014.
3. In the event that an ESI protocol is not agreed upon, the parties will submit their competing ESI protocols for resolution by the Court no later than June 17.

Respectfully submitted,

WILMER CUTLER PICKERING  
HALE and DORR LLP

s/Ryan D. Tansey

Molly S. Boast  
Jason D. Hirsch  
Hanna A. Baek  
Ryan D. Tansey  
7 World Trade Center  
250 Greenwich Street  
New York, NY 10007 USA  
+1 212 937 7262 (t)  
+1 212 230 8888 (f)  
[molly.boast@wilmerhale.com](mailto:molly.boast@wilmerhale.com)  
[jason.hirsch@wilmerhale.com](mailto:jason.hirsch@wilmerhale.com)  
[hanna.baek@wilmerhale.com](mailto:hanna.baek@wilmerhale.com)  
[ryan.tansey@wilmerhale.com](mailto:ryan.tansey@wilmerhale.com)

*Attorneys for Defendants Chesapeake Energy Corporation and O.I.L. Niagaran, LLC*

WARNER NORCROSS & JUDD LLP

s/David R. Whitfield

Brian J. Masternak (P57372)  
Lance R. Zoerhof (P63980)  
David R. Whitfield (P73352)  
WARNER NORCROSS & JUDD LLP  
900 Fifth Third Center  
111 Lyon Street NW  
Grand Rapids, MI 49503-2487  
[bmasternak@wnj.com](mailto:bmasternak@wnj.com)  
[lzoerhof@wnj.com](mailto:lzoerhof@wnj.com)  
[dwhitfield@wnj.com](mailto:dwhitfield@wnj.com)  
616.752.2000  
*Attorneys for Plaintiff NorthStar Energy LLC*

SCHIFF HARDIN LLP

s/Frederick R. Juckniess

Gregory L. Curtner (P12414)  
Jessica Sprovtsoff (P70218)  
Frederick R. Juckniess (P64032)  
SCHIFF HARDIN LLP  
350 South Main Street, Ste. 210  
Ann Arbor, MI 48104  
[gcurtner@schiffhardin.com](mailto:gcurtner@schiffhardin.com)  
[jsprovtsoff@schiffhardin.com](mailto:jsprovtsoff@schiffhardin.com)  
[fjuckniess@schiffhardin.com](mailto:fjuckniess@schiffhardin.com)  
734.222.1500  
*Attorneys for Defendants Encana Corporation and Encana Oil & Gas (USA) Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

NORTHSTAR ENERGY LLC,  
A Delaware limited liability company,

Plaintiff,  
v.

ENCANA CORPORATION,  
a Canadian corporation, and

ENCANA OIL & GAS USA INC.,

a Delaware corporation, and

CHESAPEAKE ENERGY CORPORATION,  
an Oklahoma corporation, and

O.I.L. NIAGARAN, LLC,  
a Michigan limited liability company,

Defendants.

Case No. 1:13-cv-00200-PLM

Chief Judge Paul L. Maloney

Mag. Judge Joseph G. Scoville

**[PROPOSED] ORDER RESETTING  
VOLUNTARY DISCLOSURE DATE**

The Court, having considered the foregoing Stipulation, HEREBY ORDERS that the Parties' time to voluntarily exchange documents under the Court's May 9, 2014 Case Management Order is extended to June 17, 2014. The Parties will voluntarily exchange documents on June 17, 2014 provided that they are able to reach a mutually agreeable ESI protocol by June 11, 2014. In the event that an ESI protocol is not agreed upon, the parties will submit their competing ESI protocols for resolution by the Court no later than June 17, 2014.

IT IS SO ORDERED by this Court, \_\_\_\_ day of \_\_\_\_\_, 2014

---

Hon. Paul L. Maloney  
Chief United States District Judge